

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

v. :

REINALDO GONZALEZ, JR., :

Defendant :

NO. 3:CR-25- 55

(J. Saporito)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

18 U.S.C. § 2252(a)(2)
(Receipt of Child Pornography)

On or about July 29, 2022, in Wayne County, in the Middle
District of Pennsylvania, the defendant,

REINALDO GONZALEZ, JR,

did, using a means and facility of interstate and foreign commerce,
willfully and knowingly receive a visual depiction of minors engaged in
sexually explicit conduct, to wit: file name emokid420, that was mailed,
shipped and transported, and which contained materials that were
mailed, shipped and transported, in interstate and foreign commerce,

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and in and affecting interstate and foreign commerce, by means of computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT 2
18 U.S.C. § 2252(a)(2)
(Receipt of Child Pornography)

On or about February 5, 2023, in Wayne County, in the Middle District of Pennsylvania, the defendant,

REINALDO GONZALEZ, JR,

did, using a means and facility of interstate and foreign commerce, willfully and knowingly receive a visual depiction of minors engaged in sexually explicit conduct, to wit: file name WA0068, that was mailed, shipped and transported, and which contained materials that were mailed, shipped and transported, in interstate and foreign commerce, and in and affecting interstate and foreign commerce, by means of computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT 3
18 U.S.C. § 2252(a)(2)
(Receipt of Child Pornography)

On or about February 5, 2023, in Wayne County, in the Middle District of Pennsylvania, the defendant,

REINALDO GONZALEZ, JR,

did, using a means and facility of interstate and foreign commerce, willfully and knowingly receive a visual depiction of minors engaged in sexually explicit conduct, to wit: file name WA0219, that was mailed, shipped and transported, and which contained materials that were mailed, shipped and transported, in interstate and foreign commerce, and in and affecting interstate and foreign commerce, by means of computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT 4
18 U.S.C. § 2252(a)(2)
(Receipt of Child Pornography)

On or about February 5, 2023, in Wayne County, in the Middle District of Pennsylvania, the defendant,

REINALDO GONZALEZ, JR,

did, using a means and facility of interstate and foreign commerce, willfully and knowingly receive a visual depiction of minors engaged in sexually explicit conduct, to wit: file name WA0044, that was mailed, shipped and transported, and which contained materials that were mailed, shipped and transported, in interstate and foreign commerce, and in and affecting interstate and foreign commerce, by means of computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT 5
18 U.S.C. § 2252(a)(2)
(Receipt of Child Pornography)

On or about February 5, 2023, in Wayne County, in the Middle

District of Pennsylvania, the defendant,

REINALDO GONZALEZ, JR,

did, using a means and facility of interstate and foreign commerce, willfully and knowingly receive a visual depiction of minors engaged in sexually explicit conduct, to wit: file name WA0017, that was mailed, shipped and transported, and which contained materials that were mailed, shipped and transported, in interstate and foreign commerce, and in and affecting interstate and foreign commerce, by means of computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT 6

18 U.S.C. § 2252(a)(2)
(Receipt of Child Pornography)

On or about February 5, 2023, in Wayne County, in the Middle District of Pennsylvania, the defendant,

REINALDO GONZALEZ, JR,

did, using a means and facility of interstate and foreign commerce,

willfully and knowingly receive a visual depiction of minors engaged in sexually explicit conduct, to wit: file name WA0001, that was mailed, shipped and transported, and which contained materials that were mailed, shipped and transported, in interstate and foreign commerce, and in and affecting interstate and foreign commerce, by means of computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(2).

FORFEITURE ALLEGATION

The allegation contained in Counts 1 through 6 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

2. Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense in violation of Title 18, United States Code, Section 2252(a)(2), the defendant,

REINALDO GONZALEZ, JR.,

shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, sections 2251, 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;


- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- d. has been commingled with other property which cannot
be divided without difficulty,


the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL

JOHN C. GURGANUS
Acting United States Attorney


Foreperson


JENNY P. ROBERTS
Assistant United States Attorney

2-25-2025
Date